# **EXHIBIT C**

SUPREME COURT OF THE STATE OF NEW YORK		
COUNTY OF NEW YORK		
X		
RONIT D. APPEL,	Index No.	151541/2014

-against-

SCHOEMAN UPDIKE KAUFMAN STERN & ASCHER LLP, MINDY H. STERN, BETH L. KAUFMAN, CHARLES B. UPDIKE, ANDREA D. ASCHER, SUSAN S. CASERO, CINDY NYGAARD, VERONICA LAW, LAURIE ZELIGSON, THE ZELIGSON FIRM, PAUL E. BREENE, REED SMITH LLP, MADISON 96 ASSOCIATES, LLC., STUART J. BOESKY, JAMISON WEINER, FRENCH PARTNERS, LLC, THE FEIL ORGANIZATION, INC., JEFFREY MANAGEMENT CORP., JEFFREY FEIL, JOHN FRANCIS BORRELLI ARCHITECT, P.C., JOHN FRANCIS BORRELLI, INTERIOR CONSTRUCTION CORP., JOSEPH BRUZZESE, CREATIVE ENVIRONMENT SOLUTIONS CORP., H & B CONSTRUCTION SERVICES, INC., M & B CONSTRUCTION, and M & B CONSTRUCTION SERVICES,

CONSENT TO REMOVAL

Defendants.	
	X

Putative defendants Interior Construction Corp. and Joseph Bruzzese hereby consent to the removal of the above-captioned action pending in the Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York.

Dated: New York, New York

March 18, 2014

RABINOWITZ & GALINA, ESQS.

Maxwell J. Rubin, Esq.

94 Willis Avenue Mineola, NY 11501 (516) 739-8222

 $Attorneys\ for\ Defendants$ 

Interior Construction Corp. and Joseph Bruzzese

SUPREME COURT OF THE STATE OF NEW YORK	
COUNTY OF NEW YORK	
X	
RONIT D. APPEL,	Index No.

-against-

SCHOEMAN UPDIKE KAUFMAN STERN & ASCHER LLP, MINDY H. STERN, BETH L. KAUFMAN, CHARLES B. UPDIKE, ANDREA D. ASCHER, SUSAN S. CASERO, CINDY NYGAARD, VERONICA LAW, LAURIE ZELIGSON, THE ZELIGSON FIRM, PAUL E. BREENE, REED SMITH LLP, MADISON 96 ASSOCIATES, LLC., STUART J. BOESKY, JAMISON WEINER, FRENCH PARTNERS, LLC, THE FEIL ORGANIZATION, INC., JEFFREY MANAGEMENT CORP., JEFFREY FEIL, JOHN FRANCIS BORRELLI ARCHITECT, P.C., JOHN FRANCIS BORRELLI, INTERIOR CONSTRUCTION CORP., JOSEPH BRUZZESE, CREATIVE ENVIRONMENT SOLUTIONS CORP., H & B CONSTRUCTION SERVICES, INC., M & B CONSTRUCTION, and M & B CONSTRUCTION SERVICES,

CONSENT TO REMOVAL

# Defendants.

Putative defendants John Francis Borrelli Architect, P.C. and John Francis Borrelli have not been served with a summons and complaint in this action and do not consent to personal jurisdiction over them, waive their defense of lack of personal jurisdiction or hereby appear in this action for purposes of establishing personal jurisdiction over them. John Francis Borrelli Architect, P.C. and John Francis Borrelli hereby consent to the removal of the above-captioned action pending in the Supreme Court of the

State of New York, County of New York to the United States District Court for the Southern District of New York by any or all of the other named defendants. In the event John Francis Borrelli Architect, P.C. and/or John Francis Borrelli individually is served with process, they hereby consent to the removal of the case from state to federal court and, in the event of such service, will file such additional document(s), if any, as may be necessary to demonstrate their consent to removal.

Dated:

New York, New York

March (9, 2014)

BY:

JOHN FRANCIS BORRELLI ARCHITECT, P.C.

TITLE

BY:

JOHN KRANCIS BORRELLI

SUPREME COURT OF THE STATE OF NEW YORK	
COUNTY OF NEW YORK	
X	
RONIT D. APPEL,	Index No. 151541/2014

-against-

SCHOEMAN UPDIKE KAUFMAN STERN & ASCHER LLP, MINDY H. STERN, BETH L. KAUFMAN, CHARLES B. UPDIKE, ANDREA D. ASCHER, SUSAN S. CASERO, CINDY NYGAARD, VERONICA LAW, LAURIE ZELIGSON, THE ZELIGSON FIRM, PAUL E. BREENE, REED SMITH LLP, MADISON 96 ASSOCIATES. LLC., STUART J. BOESKY, JAMISON WEINER. FRENCH PARTNERS, LLC, THE FEIL ORGANIZATION, INC., JEFFREY MANAGEMENT CORP., JEFFREY FEIL, JOHN FRANCIS BORRELLI ARCHITECT, P.C., JOHN FRANCIS BORRELLI, INTERIOR CONSTRUCTION CORP., JOSEPH BRUZZESE, CREATIVE ENVIRONMENT SOLUTIONS CORP., H & B CONSTRUCTION SERVICES, INC., M & B CONSTRUCTION, and M & B CONSTRUCTION SERVICES,

### CONSENT TO REMOVAL

Defendants.
-----X
Defendants French Partners LLC, The Feil Organization, Inc., Jeffrey

Management Corp., and Jeffrey Feil hereby consent to the removal of the above-captioned action pending in the Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York.

Dated: New York, New York

March 19, 2014

GORDON & REES LLP

Lee Henig-Elona, Esq.

18 Columbia Turnpike, Suite 220 Florham Park, New Jersey 07932

(973) 549-2520

Attorney for Defendants French Partners, LLC, The Feil Organization, Inc., Jeffrey Management Corp., and Jeffrey Feil

SUPREME COURT OF THE	STATE OF NEW YORK
COUNTY OF NEW YORK	
	X
RONIT D. APPEL,	Index No. 151541/2014

-against-

SCHOEMAN UPDIKE KAUFMAN STERN & ASCHER LLP, MINDY H. STERN, BETH L. KAUFMAN, CHARLES B. UPDIKE, ANDREA D. ASCHER, SUSAN S. CASERO, CINDY NYGAARD. VERONICA LAW, LAURIE ZELIGSON, THE ZELIGSON FIRM, PAUL E. BREENE, REED SMITH LLP, MADISON 96 ASSOCIATES, LLC., STUART J. BOESKY, JAMISON WEINER, FRENCH PARTNERS, LLC, THE FEIL ORGANIZATION, INC., JEFFREY MANAGEMENT CORP., JEFFREY FEIL, JOHN FRANCIS BORRELLI ARCHITECT, P.C., JOHN FRANCIS BORRELLI, INTERIOR CONSTRUCTION CORP., JOSEPH BRUZZESE, CREATIVE ENVIRONMENT SOLUTIONS CORP... H & B CONSTRUCTION SERVICES, INC., M & B CONSTRUCTION, and M & B CONSTRUCTION SERVICES,

### CONSENT TO REMOVAL

# Defendants.

Putative defendant H & B Construction Services, Inc., hereby consents to the removal of the above-captioned action pending in the Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York.

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Dated: New York, New York March 21, 2014

BY: William Jotutta
H & B CONSTRUCTION SERVICES, INC.

TITLE: President

UNITED STATES DISTRICT COURT			
SOUTHERN DISTRICT OF NEW YORK			
RONIT D. APPEL,	Index No.:	151541	12014

-against-

CONSENT TO REMOVAL

SCHOEMAN UPDIKE KAUFMAN STERN & ASCHER LLP, MINDY H. STERN, BETH L. KAUFMAN, CHARLES B. UPDIKE, ANDREA D. ASCHER, SUSAN S. CASERO, CINDY NYGAARD, VERONICA LAW, LAURIE ZELIGSON, THE ZELIGSON FIRM, PAUL E. BREENE, REED SMITH LLP, MADISON 96 ASSOCIATES, LLC, STUART J. BOESKY, JAMISON WEINER, FRENCH PARTNERS, LLC, THE FEIL ORGANIZATION, INC., JEFFREY MANAGEMENT CORP., JEFFREY FEIL, JOHN FRANCIS BORRELLI ARCHITECT, P.C., JOHN FRANCIS BORRELLI, INTERIOR CONSTRUCTION CORP., JOSEPH BRUZZESE, CREATIVE ENVIRONMENT SOLUTIONS CORP., H & B CONSTRUCTION SERVICES, INC., M & B CONSTRUCTION, and M & B CONSTRUCTION SERVICES,

Defendants.	
	X

Putative defendants The Zeligson Firm and Laurie Zeligson hereby consent to the removal of the above-captioned action pending in the Supreme Court of the State of New York, County of New York to the United States

District Court for the Southern District of New York.

Dated:

New York, New York March <u>17</u>, 2014

BY:

SUPREME COURT OF THE STATE OF NEW	YORK	-	
COUNTY OF NEW YORK			
	X		
RONIT D. APPEL,		Index No.	151541/2014

-against-

SCHOEMAN UPDIKE KAUFMAN STERN & ASCHER LLP, MINDY H. STERN, BETH L. KAUFMAN, CHARLES B. UPDIKE, ANDREA D. ASCHER, SUSAN S. CASERO, CINDY NYGAARD, VERONICA LAW, LAURIE ZELIGSON, THE ZELIGSON FIRM, PAUL E. BREENE. REED SMITH LLP, MADISON 96 ASSOCIATES, LLC., STUART J. BOESKY, JAMISON WEINER, FRENCH PARTNERS, LLC, THE FEIL ORGANIZATION, INC., JEFFREY MANAGEMENT CORP., JEFFREY FEIL, JOHN FRANCIS BORRELLI ARCHITECT, P.C., JOHN FRANCIS BORRELLI, INTERIOR CONSTRUCTION CORP., JOSEPH BRUZZESE, CREATIVE ENVIRONMENT SOLUTIONS CORP., H & B CONSTRUCTION SERVICES, INC., M & B CONSTRUCTION, and M & B CONSTRUCTION SERVICES,

CONSENT TO REMOVAL

Defendants.

Defendants Madison 96 Associates LLC, Stuart J. Boesky and Jamison Weiner hereby consent to the removal of the above-captioned action pending in the Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York.

Dated: New York, New York

March 20, 2014

HARNIK LAW FIRM

Stephen u. lul

Jamison Weiner

BY: \_\_\_\_\_

Stephen M. Harnik, Esq. 623 Fifth Avenue, 24<sup>th</sup> Floor New York, New York 10022-6831 (212) 599-7575 Attorney for Defendants Madison 96 Associates LLC, Stuart J. Boesky, and

SUPREME COURT OF THE STATE OF NEW YORK	•		
COUNTY OF NEW YORK			7
RONIT D. APPEL,	Index No.	15 15 41	12014

-against-

SCHOEMAN UPDIKE KAUFMAN STERN & ASCHER LLP, MINDY H. STERN, BETH L. KAUFMAN, CHARLES B. UPDIKE, ANDREA D. ASCHER, SUSAN S. CASERO, CINDY NYGAARD, VERONICA LAW, LAURIE ZELIGSON. THE ZELIGSON FIRM, PAUL E. BREENE, REED SMITH LLP, MADISON 96 ASSOCIATES. LLC., STUART J. BOESKY, JAMISON WEINER, FRENCH PARTNERS, LLC, THE FEIL ORGANIZATION, INC., JEFFREY MANAGEMENT CORP., JEFFREY FEIL, JOHN FRANCIS BORRELLI ARCHITECT, P.C., JOHN FRANCIS BORRELLI, INTERIOR CONSTRUCTION CORP., JOSEPH BRUZZESE, CREATIVE ENVIRONMENT SOLUTIONS CORP., H & B CONSTRUCTION SERVICES, INC., M & B CONSTRUCTION, and M & B CONSTRUCTION SERVICES,

CONSENT TO REMOVAL

Defendants.	
	X

Defendants Reed Smith LLP and Paul E. Breene hereby consent to the removal of the above-captioned action pending in the Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York.

## Case 1:14-cv-02065-AJN Document 2-10 Filed 03/25/14 Page 15 of 17

Dated:

New York, New York

March \_\_\_\_ 2014

SCHULTE ROTH & ZABEL LLP

RV.

Robert M. Abrahams

919 Third Avenue New York, NY 10022

(212) 756-2000

Attorney for Defendant Reed Smith LLP and

Paul E. Breene

SUPREME COURT OF THE STATE OF NEW YORK	•
COUNTY OF NEW YORK	
X	
RONIT D. APPEL.	Index No. 151541/2014

#### Plaintiff.

-against-

SCHOEMAN UPDIKE KAUFMAN STERN & ASCHER LLP, MINDY H. STERN, BETH L. KAUFMAN, CHARLES B. UPDIKE, ANDREA D. ASCHER, SUSAN S. CASERO, CINDY NYGAARD, VERONICA LAW, LAURIE ZELIGSON. THE ZELIGSON FIRM, PAUL E. BREENE, REED SMITH LLP, MADISON 96 ASSOCIATES, LLC., STUART J. BOESKY, JAMISON WEINER, FRENCH PARTNERS, LLC, THE FEIL ORGANIZATION, INC., JEFFREY MANAGEMENT CORP., JEFFREY FEIL, JOHN FRANCIS BORRELLI ARCHITECT, P.C., JOHN FRANCIS BORRELLI, INTERIOR CONSTRUCTION CORP., JOSEPH BRUZZESE, CREATIVE ENVIRONMENT SOLUTIONS CORP., H & B CONSTRUCTION SERVICES, INC., M & B CONSTRUCTION, and M & B CONSTRUCTION SERVICES,

### CONSENT TO REMOVAL

### Defendants.

Putative defendant Creative Environment Solutions Corp. hereby consents to the removal of the above-captioned action pending in the Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York.

Dated:

New York, New York

March 24, 2014

BY:

CREATIVE ENVIRONMENT SOLUTIONS

CORP.

TITLE: Financial Director